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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PATRICIA SOMERS, as trustee¹ for the Valesco
Irrevocable Trust dated June 16, 2004,

Plaintiff,

vs.

MIDLAND NATIONAL LIFE INSURANCE
COMPANY,

Defendant.

CASE NO.: 2:22-cv-1904-APG-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
PLAINTIFF'S MOTION FOR REMAND
(ECF NO. 9)**

(FIRST REQUEST)

Midland National Life Insurance Company, the defendant in this removed action ("Midland"), by and through its counsel of record, the law firm of Holley Driggs, and Plaintiff Patricia Somers, as trustee for the Valesco Irrevocable Trust dated June 16, 2004 ("Plaintiff"), by and through her counsel of record, the law firm of Lee Kiefer & Park, LLP, hereby stipulate and agree as follows:

1. On December 12, 2022, Plaintiff filed her Motion for Remand (ECF No. 9).

2. The current deadline for Midland to respond to the Motion for Remand is December 26, 2022 (the "Response Deadline").

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¹ By signing this stipulation, Midland does not waive any right to challenge Patricia Somers's status as trustee for the Valesco Irrevocable Trust dated June 16, 2004.

3. Because the Response Deadline is the day after the Christmas holiday, the parties agreed that a two-week extension of the Response Deadline is appropriate.

4. Accordingly, the parties stipulate and agree that the Response Deadline shall be extended to January 9, 2023. This is the parties' first request for an extension of this deadline, and such request is not meant for the purpose of causing undue delay.

IT IS SO STIPULATED.

DATED this 15th day of December, 2022

HOLLEY DRIGGS

/s/ F. Thomas Edwards

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*Attorneys for Defendant Midland National
Life Insurance Company*

DATED this 15th day of December, 2022

LEE KIEFER & PARK, LLP

/s/ Matthew W. Park

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*Attorneys for Plaintiff, Patricia Somers,
Trustee*

ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

DATED: December 16, 2022